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DIVORCE IN ENGLAND—RECRIMINATION—A CONTRAST—When told of the inequality of the English law in the case of women we are all more or less incredulous. But two cases printed side by side in a recent number of the *Law Times* depict more eloquently than a dozen addresses the extraordinary double standard of morals that prevails in a country so advanced in some respects, yet so backward in others. The facts briefly digested are sufficient without comment.

In *Goddard v. Goddard*¹ the wife, the petitioner, testified that from the commencement of the married life the respondent, the husband, had treated her with the grossest cruelty, frequently blacking her eyes. On one occasion he seized her by the hair and dragged her out of bed. On another, he knocked her down in the street when she was carrying a child and the child died in consequence. In 1902 he deserted her and went to live with another woman with whom he thereafter resided. The petitioner then went to work in a factory but her health gave way and her earnings fell to nine shillings a week. Her children were both delicate, one of them consumptive. She consulted a solicitor about a divorce but the costs were prohibitive. She then went to work as a housekeeper and after her employer's death lived with his son as his mistress because he took pity on her and was willing to make a home for her children. He was now anxious to marry her if the court were to grant her a decree. The court said: "I do not think the husband's conduct ought to have conduced. It may have conduced but I do not think it ought to have done so." The petition was dismissed.

On the following day before the same judge was heard the case of *Clutterbuck v. Clutterbuck*.² There the petition was by a minor suing by his father as guardian for a dissolution of his marriage. The testimony was that the petitioner, nineteen years of age, met the respondent while at a public school; that in December of 1914 he obtained a commission in a regiment and married the respondent January 23, 1915. They were together only occasionally and at the end of March, 1915, the respondent went away with the co-respondent, writing to the petitioner that she was going to leave him forever. The petitioner testified that in consequence of this letter he was terribly depressed and while in a state of despair committed adultery on two occasions. The court said: "The letter of 31st March may have caused absolute desperation, and I think that the petitioner's adultery was the direct result of his wife's conduct towards him. In the special circumstances of the case I will exercise my discretion and grant the petitioner a decree *nisi*."

W. H. L.

¹ 113 LAW TIMES 1063 (1915).

² 113 LAW TIMES 1063 (1915).